

**UNITED STATES BANKRUPTCY COURT**

**NORTHERN DISTRICT OF NEW YORK**

**In re:**

Kris Daniel Roglieri, Debtor

Chapter 7

Case No.: 24-10157-1-REL

**Kris Roglieri**

N-4 #45131

Rensselaer County Jail

4000 Main Street

Troy, NY 12180

**July 15, 2025**

Honorable Robert E. Littlefield, Jr.

United States Bankruptcy Court

Northern District of New York

445 Broadway

Albany, NY 12207

**RE: Chapter 7 Case No. 24-10157-REL**

CLERK OF THE  
BANKRUPTCY COURT  
N.D. OF NY  
ALBANY

2025 JUL 15 PM 3:26

REC'D & FILED

**Dear Judge Littlefield,**

**OBJECTION TO TINA ROGLIERI'S REQUEST TO BLOCK DEBTOR'S  
HOMESTEAD EXEMPTION AND CHALLENGE TO HER CREDITOR STATUS**

Kris Roglieri, by and through his Power of Attorney, Linda Oliver, respectfully submits this written objection in response to Tina Roglieri's attorney's Affirmation in Opposition (Docket No. 520), which seeks to block the release of his properly claimed homestead exemption. He also challenges Ms. Roglieri's standing as a creditor in this case. Her claim is both untimely and without legal merit, and her actions have caused ongoing harm and delay in this bankruptcy proceeding. As detailed below, the Debtor respectfully requests that the Court deny the relief requested in Docket 520 and disallow Claim 23.

**1. Homestead Exemption Was Properly Claimed and Remains Valid**

Debtor Kris Roglieri properly claimed a homestead exemption of \$89,975 under CPLR § 5206(a) and 11 U.S.C. § 522. While Tina Roglieri filed a written objection on May 20, 2024 (Doc 183), her objection failed to establish any valid legal grounds to defeat the exemption.

Her objection does not allege fraud, improper exemption selection, or any basis that would invalidate the exemption under Bankruptcy Rule 4003(b) or controlling case law. Moreover, her objection relied solely on general marital interest and equitable distribution, which do not entitle her to reach exempt property, as affirmed in *In re Kalsi*, 637 B.R. 33 (Bankr. S.D.N.Y. 2022).

Tina did not assert that her claim was a domestic support obligation (DSO), nor did she check the required priority designation on her proof of claim. Under 11 U.S.C. § 523(a)(5), there are four legal factors that must be satisfied for a claim to be classified as a DSO:

1. The debt must be owed to or recoverable by a spouse or dependent;
2. It must be in the nature of alimony, maintenance, or support;
3. It must be established by a separation agreement, divorce decree, or court order; and
4. It must not be assigned to a third party.

Tina's claim fails to meet at least three of these four criteria.

Additionally, since Tina's objection was filed on May 20, 2024, she generally cannot amend or expand it now. Under Bankruptcy Rule 4003(b), objections to exemptions must be filed within 30 days after the meeting of creditors or 30 days after the filing of the list of exemptions, whichever is later. Her failure to raise any qualifying legal grounds within that timeframe renders her objection insufficient. Courts have consistently enforced this 30-day limit. See, e.g., *In re Rolland*, 317 B.R. 402, 413 (Bankr. C.D. Cal. 2004).

Accordingly, the homestead exemption remains valid and enforceable under *Taylor v. Freeland & Kronz*, 503 U.S. 638 (1992), which confirms that exemptions uncontested on proper legal grounds become final and binding.

## **2. Tina Roglieri's Claim Was Untimely, and She Is Not a Valid Creditor**

Tina Roglieri filed her proof of claim on August 12, 2024, after the claims bar date of July 24, 2024. As confirmed in the official claims register (Exhibit A), her claim was submitted late and is classified only as a general unsecured claim based on “marital estate interest, equitable distribution, support & maintenance.”

Because she failed to comply with Rule 3002(c), her claim must be disallowed under 11 U.S.C. § 502(b)(9). Courts have upheld the strict enforcement of bar dates in similar cases. See *In re Macias*, 195 B.R. 659 (Bankr. W.D. Tex. 1996) (“The court has no discretion to allow a late-filed unsecured claim where the bar date has passed and no exception applies.”).

In addition to her claim being untimely, the Debtor was not given a meaningful opportunity to object to Tina Roglieri’s submission due to the prior trustee’s failure to notify him while he was incarcerated. That trustee has since resigned, leaving procedural errors unresolved. This lack of notice constitutes a denial of due process under *Mullane v. Central Hanover Bank*, 339 U.S. 306 (1950), and entitles the Debtor to raise a late objection.

Courts have held that where incarcerated debtors are denied notice, equitable relief is appropriate. See *In re Colon*, 319 B.R. 1 (Bankr. D. Mass. 2004); *In re Franchi*, 451 B.R. 604 (B.A.P. 1st Cir. 2011). Accordingly, the \$3 million claim should be stricken as both untimely and procedurally defective.

### **3. Equitable Distribution Claims Are Not Domestic Support Obligations**

Tina's claim is not a "domestic support obligation" under 11 U.S.C. § 523(a)(5), and she does not assert any priority status under 11 U.S.C. § 507(a)(1). Courts, including *In re Kalsi*, have held that equitable distribution claims are general unsecured debts and cannot defeat a properly claimed exemption.

#### **4. The Trustee Confirms This Is Outside the Scope of Bankruptcy**

The Successor Trustee's statement (ECF 519) makes clear that she takes no position on Tina Roglieri's claim and does not treat it as a priority or enforceable interest against exempt property. The trustee is merely seeking a court order to resolve the issue. This aligns with case law, which shows that exempt property is not liable for general unsecured marital claims.

#### **5. Tina Roglieri's Actions Are Harassing and Obstructive**

Despite having been separated from Kris for over a decade and having received a house purchased for her by Kris after the separation, Tina continues to pursue Kris's exempt funds in bad faith. She is not entitled to any portion of the homestead exemption and is attempting to misuse the bankruptcy process to extract additional funds beyond what the law allows.

#### **6. Due Process Violations Require Her Claim to Be Voided**

Kris Roglieri was incarcerated when Tina filed her proof of claim. The previous trustee failed to notify him or provide him with an opportunity to object to her late-filed claim. That trustee has

since resigned, leaving critical procedural errors unresolved. As a result, Tina's claim slipped through unnoticed, depriving Kris of his right to respond. This situation constitutes a violation of due process.

Relevant case law supports Kris's right to object and for the court to void Tina's untimely claim:

- *In re Colon*, 319 B.R. 1 (Bankr. D. Mass. 2004): The court permitted a late objection where an incarcerated debtor had no notice of the claim.
- *In re Franchi*, 451 B.R. 604 (B.A.P. 1st Cir. 2011): Failure to notify an incarcerated debtor of the claims deadline violated due process and justified reopening.
- *Mullane v. Central Hanover Bank*, 339 U.S. 306 (1950): A foundational due process case holding that notice must be reasonably calculated to inform affected parties. If not, resulting actions are invalid.

#### **7. Breakdown of Exhibits A, B, and C Submitted in Docket 520**

- **Exhibit A (Doc 183):** Tina's objection is based solely on marital interest. It lacks any legal basis to override Kris's exemption.
- **Exhibit B (Doc 222):** A notice from the prior trustee listing Tina's claim without legal evaluation. This does not establish its validity.
- **Exhibit C (Claim 23):** Tina's actual proof of claim for \$3 million, filed late and not identified as a DSO or priority claim.

These exhibits do not change the legal outcome. Her claim is untimely, unsupported, and cannot touch exempt funds under bankruptcy law.

### **8. Additional Factual Background**

In 2019, Kris Roglieri purchased a house for Tina Roglieri for approximately \$200,000 in cash.

The property at 40 North Road, by contrast, was purchased solely by Kris Roglieri and titled only in his name. Ms. Roglieri never contributed to any mortgage payments, upkeep, or other property-related expenses. During their marriage, she did not work and was entirely supported by Kris, who also supported their children. Kris continued to provide for her financially until his arrest on May 31, 2024. Following his incarceration, Ms. Roglieri has since obtained full-time employment as a registered nurse.

These facts further support that her attempt to reach Kris's exempt homestead proceeds is neither equitable nor lawful.

### **Conclusion**

For the foregoing reasons, the Court should:

- Deny Tina Roglieri's request to hold or delay the Debtor's homestead exemption;
- Disallow Claim 23 in its entirety as untimely and non-priority;

- Direct the immediate turnover of the \$89,975 exemption to the Debtor;
- Bar Tina Roglieri from further interfering with the exempt property absent court approval.

**Respectfully submitted,**

Kris D. Roglieri

By: *Linda Oliver, as Attorney-in-Fact*

N-4 #45131

Rensselaer County Jail

4000 Main Street

Troy, NY 12180

A handwritten signature in black ink, appearing to read "Linda Oliver". The signature is fluid and cursive, with a large initial "L" and a distinct "O".



## **Exhibit A**

**Claims Summary Showing Late Filing of Tina Roglieri's Proof of Claim**

## Northern District of New York Claims Register

24-10157-1-rel Kris Daniel Roglieri Converted 05/15/2024

**Judge:** Robert E. Littlefield, Jr.

**Chapter:** 7

**Office:** Albany

**Last Date to file claims:** 07/24/2024

**Trustee:** Christian H. Dribusch-Trustee

**Last Date to file (Govt):** 08/13/2024

**Creditor:** (909537759) History  
NYS Dept. Taxation & Finance  
PO Box 5300  
Albany, NY 12205-0300

**Claim No:** 1  
*Original Filed*  
*Date:* 02/21/2024  
*Original Entered*  
*Date:* 02/21/2024

**Status:**  
*Filed by:* CR  
*Entered by:* David M Pugliese  
*Modified:*

Amount claimed: \$558732.30

Secured claimed: \$558732.30

**History:**

Details      1-1    02/21/2024 Claim #1 filed by NYS Dept. Taxation & Finance, Amount claimed: \$558732.30 (Pugliese, David)

**Description:** (1-1) pre petition proof of claim

**Remarks:**

**Creditor:** (909537756)  
First Federal  
PO Box 351  
Port Angeles, WA 98362

**Claim No:** 2  
*Original Filed*  
*Date:* 02/21/2024  
*Original Entered*  
*Date:* 02/21/2024

**Status:**  
*Filed by:* CR  
*Entered by:*  
*Modified:*

Amount claimed: \$229913.63

Secured claimed: \$229913.63

**History:**

Details      2-1    02/21/2024 Claim #2 filed by First Federal, Amount claimed: \$229913.63 (admin)

**Description:**

**Remarks:** (2-1) Account Number (last 4 digits):4109

**Creditor:** (909537790)  
Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

**Claim No:** 3  
*Original Filed*  
*Date:* 02/28/2024  
*Original Entered*  
*Date:* 02/28/2024

**Status:**  
*Filed by:* CR  
*Entered by:* Diane Fredette  
*Modified:*

Amount claimed: \$1068351.76

Secured claimed: \$0.00

Priority claimed: \$1068351.76

**History:**

Details      3-1    02/28/2024 Claim #3 filed by Internal Revenue Service, Amount claimed: \$1068351.76 (Fredette, Diane)

**Description:**

**Remarks:**

**Creditor:** (909548926) History  
JPMorgan Chase Bank, N.A.  
s/b/m/t Chase Bank USA, N.A.  
c/o National Bankruptcy Services, LLC  
P.O. Box 9013  
Addison, TX 75001

**Claim No: 4**  
*Original Filed*  
*Date: 03/20/2024*  
*Original Entered*  
*Date: 03/20/2024*

**Status:**  
*Filed by: CR*  
*Entered by: Issa Francis Kamara*  
*Modified:*

Amount claimed: \$27650.45

**History:**

Details 4-1 03/20/2024 Claim #4 filed by JPMorgan Chase Bank, N.A., Amount claimed: \$27650.45 (Kamara, Issa)

**Description:**

**Remarks:**

**Creditor:** (909549694)  
Discover Bank  
P.O. Box 3025  
New Albany, OH 43054-3025

**Claim No: 5**  
*Original Filed*  
*Date: 03/22/2024*  
*Original Entered*  
*Date: 03/22/2024*

**Status:**  
*Filed by: CR*  
*Entered by: Addie Lucas*  
*Modified:*

Amount claimed: \$7853.61

**History:**

Details 5-1 03/22/2024 Claim #5 filed by Discover Bank, Amount claimed: \$7853.61 (Lucas, Addie)

**Description:**

**Remarks:**

**Creditor:** (909552508)  
Onward Holdings, LLC  
5152 N Edgewood Dr, Suite 375  
Provo, UT 84604

**Claim No: 6**  
*Original Filed*  
*Date: 04/01/2024*  
*Original Entered*  
*Date: 04/01/2024*

**Status:**  
*Filed by: CR*  
*Entered by:*  
*Modified:*

Amount claimed: \$3000000.00

**History:**

Details 6-1 04/01/2024 Claim #6 filed by Onward Holdings, LLC, Amount claimed: \$3000000.00 (admin)

**Description:**

**Remarks:**

**Creditor:** (909553476)  
Denali State Bank and Woodside Capital, LLC  
Harris Beach PLLC, Attn: Brian D. Roy, E  
333 W. Washington Street, Suite 200  
Syracuse, New York 13202

**Claim No: 7**  
*Original Filed*  
*Date: 04/04/2024*  
*Original Entered*  
*Date: 04/04/2024*

**Status:**  
*Filed by: CR*  
*Entered by: Brian D. Roy*  
*Modified:*

Amount claimed: \$397445.59

Secured claimed: \$397445.59

**History:**

Details 7-1 04/04/2024 Claim #7 filed by Denali State Bank and Woodside Capital, LLC, Amount claimed: \$397445.59 (Roy, Brian)

**Description: (7-1) Lien on Vehicle Title**

**Remarks:**

**Creditor:** (909553532)  
1800 Park Avenue LLC  
c/o Carpenter Hazlewood Delgado & Bolen  
1400 E Southern Ave Ste 400  
Tempe, AZ 85282

**Claim No: 8**  
*Original Filed*  
*Date: 04/04/2024*  
*Original Entered*  
*Date: 04/04/2024*

**Status:**  
*Filed by: CR*  
*Entered by: Chad P. Miesen*  
*Modified:*

Amount claimed: \$15066052.48

**History:**

Details 8-1 04/04/2024 Claim #8 filed by 1800 Park Avenue LLC, Amount claimed: \$15066052.48 (Miesen, Chad)

**Description:** (8-1) Fraud, Conversion, RICO (18 USC 1964(c))

**Remarks:**

**Creditor:** (909554059)  
Brittney Stewart  
1316 Cougar Lane  
Capitol Heights, MD 20743

**Claim No: 9**  
*Original Filed*  
*Date: 04/06/2024*  
*Original Entered*  
*Date: 04/06/2024*

**Status:**  
*Filed by: CR*  
*Entered by:*  
*Modified:*

Amount claimed: \$96500.00

**History:**

Details 9-1 04/06/2024 Claim #9 filed by Brittney Stewart, Amount claimed: \$96500.00 (admin)

**Description:**

**Remarks:**

**Creditor:** (909557009)  
Compass-Charlotte 1031, LLC  
Attn: William L. Esser IV, Esq.  
6520 South Tryon Street, Suite 800  
Charlotte, NC 28202

**Claim No: 10**  
*Original Filed*  
*Date: 04/18/2024*  
*Original Entered*  
*Date: 04/18/2024*

**Status:**  
*Filed by: AT*  
*Entered by: Will Esser*  
*Modified:*

Amount claimed: \$51305136.00

**History:**

Details 10-1 04/18/2024 Claim #10 filed by Compass-Charlotte 1031, LLC, Amount claimed: \$51305136.00 (Esser, Will)

**Description:** (10-1) Fraud, conversion, unfair and deceptive trade practices, civil RICO

**Remarks:**

**Creditor:** (909557994)  
Prime Capital Ventures, LLC  
c/o Paul A. Levine, Esq., Receiver  
677 Broadway - 8th Floor  
Albany, NY 12207

**Claim No: 11**  
*Original Filed*  
*Date: 04/22/2024*  
*Original Entered*  
*Date: 04/22/2024*

**Status:**  
*Filed by: AT*  
*Entered by: Paul A. Levine*  
*Modified:*

Amount claimed: \$100000000.00

**History:**

Details 11-1 04/22/2024 Claim #11 filed by Prime Capital Ventures, LLC, Amount claimed: \$100000000.00 (Levine, Paul)

**Description:**

**Remarks:**

**Creditor:** (909560798)  
Caesars Palace  
c/o McDonald Carano LLP, Ryan J. Works  
2300 West Sahara Avenue, Suite 1200  
Las Vegas, NV 89102

**Claim No: 12**  
*Original Filed*  
*Date: 04/30/2024*  
*Original Entered*  
*Date: 04/30/2024*

**Status:**  
*Filed by: CR*  
*Entered by:*  
*Modified:*

Amount claimed: \$436237.18

**History:**

Details 12-1 04/30/2024 Claim #12 filed by Caesars Palace, Amount claimed: \$436237.18 (admin)

**Description:**

**Remarks:**

**Creditor:** (909545005)  
Christopher M. Desiderio  
Nixon Peabody LLP  
bob CoNexions Medical, Inc.  
55 West 46th Street  
New York, NY 10036

**Claim No: 13**  
*Original Filed*  
*Date: 05/02/2024*  
*Original Entered*  
*Date: 05/02/2024*

**Status:**  
*Filed by: CR*  
*Entered by: Christopher M. Desiderio*  
*Modified:*

Amount claimed: \$6150000.00

**History:**

Details 13-1 05/02/2024 Claim #13 filed by Christopher M. Desiderio, Amount claimed: \$6150000.00 (Desiderio, Christopher)

**Description:**

**Remarks:**

**Creditor:** (909562118)  
Piper Capital Funding LLC  
95 Fairway Drive  
Harrisburg, IL 62946

**Claim No: 14**  
*Original Filed*  
*Date: 05/07/2024*  
*Original Entered*  
*Date: 05/07/2024*

**Status:**  
*Filed by: CR*  
*Entered by: Jon Travis Powers*  
*Modified:*

Amount claimed: \$10658259.84

**History:**

Details 14-1 05/07/2024 Claim #14 filed by Piper Capital Funding LLC, Amount claimed: \$10658259.84 (Powers, Jon)

**Description:**

**Remarks:**

**Creditor:** (909562383) History.  
ER Tennessee LLC  
Joseph P. Lombardo  
320 South Canal Street  
28th Floor  
Chicago, IL 60606

**Claim No: 15**  
*Original Filed*  
*Date: 05/08/2024*  
*Original Entered*  
*Date: 05/08/2024*

**Status:**  
*Filed by: CR*  
*Entered by: Joseph Lombardo*  
*Modified:*

Amount claimed: \$15355473.21

**History:**

Details 15-1 05/08/2024 Claim #15 filed by ER Tennessee LLC, Amount claimed: \$15355473.21 (Lombardo, Joseph)

**Description:**

**Remarks:**

**Creditor:** (909568087)  
KeyBank National Association  
c/o Nolan Heller Kauffman LLP  
80 State St., 11th Floor  
Albany, NY 12207

**Claim No: 16**  
**Original Filed**  
**Date:** 05/28/2024  
**Original Entered**  
**Date:** 05/28/2024

**Status:**  
**Filed by:** CR  
**Entered by:** Francis J. Brennan  
**Modified:**

Amount claimed: \$112130.00  
Secured claimed: \$0.00  
Priority claimed: \$0.00

**History:**

**Details** **16-1** 05/28/2024 Claim #16 filed by KeyBank National Association, Amount claimed: \$112130.00 (Brennan, Francis)

**Description:** (16-1) Personal Guarantees of Merchant Processing Agreements

**Remarks:**

**Creditor:** (909569176)  
SP Harbor QOZB, LP  
c/o Matthew F. Kye, Esq.  
Kye Law Group, P.C.  
201 Old Country Road, Suite 120  
Melville, NY 11747

**Claim No: 17**  
**Original Filed**  
**Date:** 07/11/2024  
**Original Entered**  
**Date:** 07/11/2024

**Status:**  
**Filed by:** CR  
**Entered by:** Matthew F. Kye  
**Modified:**

Amount claimed: \$2500000.00

**History:**

**Details** **17-1** 07/11/2024 Claim #17 filed by SP Harbor QOZB, LP, Amount claimed: \$2500000.00 (Kye, Matthew)

**Description:**

**Remarks:**

**Creditor:** (909582247)  
KEYBANK, N.A.  
c/o Weltman, Weinberg & Reis Co., LPA  
5990 West Creek Road, Suite 200  
Independence, OH 44131

**Claim No: 18**  
**Original Filed**  
**Date:** 07/18/2024  
**Original Entered**  
**Date:** 07/18/2024

**Status:**  
**Filed by:** CR  
**Entered by:** Garry Alan Masterson  
**Modified:**

Amount claimed: \$102764.17  
Secured claimed: \$102764.17

**History:**

**Details** **18-1** 07/18/2024 Claim #18 filed by KEYBANK, N.A., Amount claimed: \$102764.17 (Masterson, Garry)

**Description:**

**Remarks:**

**Creditor:** (909583450)  
SQRL Holdings, LLC  
Wuersch & Gering  
100 Wall Street, 10th Floor  
New York, NY 10005

**Claim No: 19**  
**Original Filed**  
**Date:** 07/23/2024  
**Original Entered**  
**Date:** 07/23/2024

**Status:**  
**Filed by:** CR  
**Entered by:**  
**Modified:**

Amount claimed: \$4462500.00

**History:**

**Details** **19-1** 07/23/2024 Claim #19 filed by SQRL Holdings, LLC, Amount claimed: \$4462500.00 (admin)

**Description:**

**Remarks:**

**Creditor:** (909583644)  
526 Murfreesboro LLC  
c/o Nolan Heller Kauffman LLP  
80 State St., 11th Floor  
Albany, NY 12207

**Claim No: 20**  
*Original Filed*  
*Date: 07/23/2024*  
*Original Entered*  
*Date: 07/23/2024*

**Status:**  
*Filed by: CR*  
*Entered by: Justin A. Heller*  
*Modified:*

Amount claimed: \$13246937.76

**History:**

Details 20-1 07/23/2024 Claim #20 filed by 526 Murfreesboro LLC, Amount claimed: \$13246937.76 (Heller, Justin)

**Description:** (20-1) Breach of Contract, Fraud, RICO

**Remarks:**

**Creditor:** (909583679)  
Mark J. Schlant (**ADMINISTRATIVE**)  
1600 Main Place Tower  
350 Main Street  
Buffalo, NY 14202

**Claim No: 21**  
*Original Filed*  
*Date: 07/23/2024*  
*Original Entered*  
*Date: 07/23/2024*

**Status:**  
*Filed by: CR*  
*Entered by: Mark J. Schlant-Trustee*  
*Modified:*

Admin claimed: \$7589.68

**History:**

Details 21-1 07/23/2024 Claim #21 filed by Mark J. Schlant, Admin claimed: \$7589.68 (Schlant-Trustee, Mark)

**Description:** (21-1) For fees and expenses as Chapter 11/Subchapter V trustee

**Remarks:**

**Creditor:** (909584082)  
Newlight Technologies Inc.  
c/o Nolan Heller Kauffman LLP  
80 State St., 11th Floor  
Albany, NY 12207

**Claim No: 22**  
*Original Filed*  
*Date: 07/24/2024*  
*Original Entered*  
*Date: 07/24/2024*

**Status:**  
*Filed by: CR*  
*Entered by: Justin A. Heller*  
*Modified:*

Amount claimed: \$7762603.44

**History:**

Details 22-1 07/24/2024 Claim #22 filed by Newlight Technologies Inc., Amount claimed: \$7762603.44 (Heller, Justin)

**Description:** (22-1) Breach of Contract, Fraud, RICO

**Remarks:**

**Creditor:** (909588885) History  
Tina Roglieri  
O'Connell and Aronowitz  
54 State Street, 9th Floor  
Albany, NY 12207

**Claim No: 23**  
*Original Filed*  
*Date: 08/12/2024*  
*Original Entered*  
*Date: 08/12/2024*

**Status:**  
*Filed by: CR*  
*Entered by: Brian M Culnan*  
*Modified:*

Amount claimed: \$3000000.00

**History:**

Details 23-1 08/12/2024 Claim #23 filed by Tina Roglieri, Amount claimed: \$3000000.00 (Culnan, Brian)

**Description:** (23-1) marital estate interest, equitable distribution, support & maintenance

**Remarks:**

After 7/24/24:  
late /  
should  
object

**Creditor:** (909588920)  
Camshaft CRE 1 Limited Liability Company  
950 Brickell Bay Dr  
5107  
Miami, FL 33131

**Claim No: 24**  
*Original Filed*  
*Date: 08/12/2024*  
*Original Entered*  
*Date: 08/12/2024*

**Status:**  
*Filed by: CR*  
*Entered by:*  
*Modified:*

Amount claimed: \$16594117.64

**History:**

Details      24-1    08/12/2024 Claim #24 filed by Camshaft CRE 1 Limited Liability Company, Amount claimed: \$16594117.64 (admin)

**Description:**

**Remarks:** (24-1) Filer Comment: Due to confidentiality documents available upon request

**Creditor:** (909589158)  
Hogan Lovells US LLP  
Attn: Christopher R. Bryant  
390 Madison Avenue  
New York, NY 10017

**Claim No: 25**  
*Original Filed*  
*Date: 08/13/2024*  
*Original Entered*  
*Date: 08/13/2024*

**Status:**  
*Filed by: CR*  
*Entered by:*  
*Modified:*

Amount claimed: \$1083205.79

**History:**

Details      25-1    08/13/2024 Claim #25 filed by Hogan Lovells US LLP, Amount claimed: \$1083205.79 (admin)

**Description:**

**Remarks:**

**Creditor:** (909589717)  
B and R Acquisition Partners, LLC  
c/o Balch & Bingham LLP  
188 E. Capitol Street, Suite 1400  
Jackson, MS 39201

**Claim No: 26**  
*Original Filed*  
*Date: 08/14/2024*  
*Original Entered*  
*Date: 08/14/2024*

**Status:**  
*Filed by: CR*  
*Entered by: Michael Patrick Everman*  
*Modified:*

Amount claimed: \$17400000.00

**History:**

Details      26-1    08/14/2024 Claim #26 filed by B and R Acquisition Partners, LLC, Amount claimed: \$17400000.00 (Everman, Michael)

**Description:**

**Remarks:**

**Creditor:** (909589718)  
JHM Lending Ventures, LLC  
c/o Balch & Bingham LLP  
188 E. Capitol Street, Suite 1400  
Jackson, MS 39201

**Claim No: 27**  
*Original Filed*  
*Date: 08/14/2024*  
*Original Entered*  
*Date: 08/14/2024*

**Status:**  
*Filed by: CR*  
*Entered by: Michael Patrick Everman*  
*Modified:*

Amount claimed: \$17400000.00

**History:**

Details      27-1    08/14/2024 Claim #27 filed by JHM Lending Ventures, LLC, Amount claimed: \$17400000.00 (Everman, Michael)

**Description:**

**Remarks:**

## Claims Register Summary



**Case Name:** Kris Daniel Roglieri

**Case Number:** 24-10157-1-rel

**Chapter:** 7

**Date Filed:** 02/15/2024

**Total Number Of Claims:** 27

<b>Total Amount Claimed*</b>	\$288021864.85
<b>Total Amount Allowed*</b>	

\*Includes general unsecured claims

**The values are reflective of the data entered. Always refer to claim documents for actual amounts.**

	<b>Claimed</b>	<b>Allowed</b>
<b>Secured</b>	\$1288855.69	
<b>Priority</b>	\$1068351.76	
<b>Administrative</b>	\$7589.68	

<b>PACER Service Center</b>			
<b>Transaction Receipt</b>			
08/20/2024 09:36:14			
<b>PACER Login:</b>	genmal465	<b>Client Code:</b>	
<b>Description:</b>	Claims Register	<b>Search Criteria:</b>	24-10157-1-rel Filed or Entered From: 8/13/2022 Filed or Entered To: 8/20/2024
<b>Billable Pages:</b>	3	<b>Cost:</b>	0.30

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF NEW YORK**

**In re:**

**KRIS ROGLIERI, Debtor**

**Chapter 7**

**Case No. 24-10157-REL**

**CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2025, I caused a true and correct copy of the foregoing  
**Objection to Tina Roglieri's Request to Block Debtor's Homestead Exemption and  
Challenge to Her Creditor Status** to be served by U.S. Mail, first-class postage prepaid, upon  
the following parties:

- **Clerk of the United States Bankruptcy Court**

United States Bankruptcy Court

Northern District of New York

445 Broadway, Suite 330

Albany, NY 12207

- **United States Trustee's Office**

Attn: Lisa M. Penpraze, Assistant U.S. Trustee

Leo W. O'Brien Federal Building

11A Clinton Avenue, Room 620

Albany, NY 12207

- **Marieanne O'Toole, Chapter 7 Trustee**

2 Depot Plaza, Suite 2E

Bedford Hills, NY 10507

- **Holly R. Holecek, Esq.**

Partner

3305 Jerusalem Avenue

Wantagh, New York 11793

- **Brian M. Culnan, Esq.**

Of Counsel, O'Connell and Aronowitz, P.C.

54 State Street

Albany, NY 12207

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

**Dated:** July 15, 2025

**Respectfully submitted,**

Kris D. Roglieri

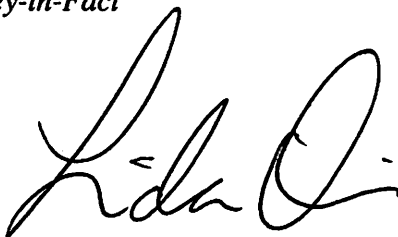
By: *Linda Oliver, as Attorney-in-Fact*

N-4 #45131

Rensselaer County Jail

4000 Main Street

Troy, NY 12180

A handwritten signature in black ink, appearing to read "Linda Oliver", is written over the typed name and address of Linda Oliver.